UNITED STATES DISTRICT COURT EASTERN DISTRICT of TENNESSEE at CHATTANOOGA

IN THE MATTER OF THE SEIZURE OF:

Funds up to the amount of \$399,925.68 in account number

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1:19-MJ- 3 2
1:19-MJ- 3 3
1:19-MJ- 3 3
1:19-MJ- 3 4

Funds up to the amount of \$397,000.00 in account number
1:19-MJ- 35
1000184878758 at SunTrust Bank, account name Fatima
1:19-MJ- 36
1:19-MJ- 37

Funds up to the amount of \$18,600.00 in account number 1000225674083 at SunTrust Bank, account name Fatima Sadruddin "Grocery";

Magistrate Judge Lee

Case Nos. 1:19-MJ- 30

Filed Under Seal

A white 2017 Ford F-150 pickup truck, VIN 1FTEW1EG1HFB85829;

Funds up to the amount of \$302,000.00 in account number 7201420655 at Wells Fargo Bank, account name Service At Convenience LLC;

Funds up to the amount of \$439,838.00 in the account of Karim or Rehana K. Sadruddin at Fifth Third Bank, account number 7900817623;

Funds up to the amount of \$243,918.50 in the account of Karim or Rehana K. Sadruddin at Fifth Third Bank, account number 9931415625; and

Funds up to the amount of \$431,390.13 in the account of Rehana K. Sadruddin at Fifth Third Bank, account number 9931926407.

MOTION TO SEAL

Comes now the United States of America by and through J. Douglas Overbey, United States Attorney for the Eastern District of Tennessee, and Steven S. Neff, Assistant United States Attorney, and requests that the Court order the Applications for the Seizure Warrants, the Seizure Warrants, the Affidavits in support of the Seizure Warrants, any subsequently filed

Returns and Inventory, the Motion to Seal, and the proposed Sealing Order filed in the above styled cases be placed under seal with the Clerk of Court.

In this case, such an order would be appropriate because the warrants relates to an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation and endanger cooperating sources in the investigation. Accordingly, there is reason to believe that notification of the existence of the warrants will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify confederates. See 18 U.S.C. § 2705(b)(2), (3), (5).

Wherefore, the United States respectfully requests that the Court order that the Applications for the Seizure Warrants, the Seizure Warrants, the Affidavits in support of the Seizure Warrants, any subsequently filed Returns and Inventory, the Motion to Seal, and the proposed Sealing Order be placed under seal and remain there for 180 days, up to and including May 26 August 25, 2019. As explained above, these documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation.

Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

J. DOUGLAS OVERBEY United States Attorney

By:

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